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Please reply to New Jersey

July 29, 2010

VIA ELECTRONIC MAIL

The Honorable Michael A. Shipp
U.S. Magistrate, United States District Court
Martin Luther King Jr. Federal Building and U.S. Court
50 Walnut Street
Newark, NJ 07102

RE: **WALSH SECURITIES, INC. VS. CRISTO PROP.**

Our File No. : 45987 MRM
Docket No. : 2:97-CV-03496

Dear Judge Shipp:

Pursuant to your request during the last telephone conference, both myself on behalf of the defendant Coastal Title and Mr. Manning on behalf of the Defendant Skowrenski/NHF plan to file motions to dismiss the crossclaims of the Title Insurance defendants, represented by Mr. Kott and Mr. Hayes. I can certify to Your Honor that neither the motions, nor any anticipated opposition thereto, are in any sense "discovery dependent". They are applications based solely on the law and the pleadings.

Your Honor also inquired about a briefing schedule. My motion /brief as well as that of Mr. Manning is completed and can be filed at any time. I have been advised by the Title Insurance defendants that, absent any extraordinary circumstances, they would need 21 days from the date of the filing and service of the moving papers to respond. I should think that an additional 7 days from the receipt of the opposition would be appropriate for any rebuttal, if necessary.

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Should this timeline meet with Your Honors approval, please advise and I will forward an Order encompassing same.

Very truly yours,

METHFESSEL & WERBEL, ESQS.

A handwritten signature in dark ink, appearing to read "Martin R. McGowan".

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MRM:daf.

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